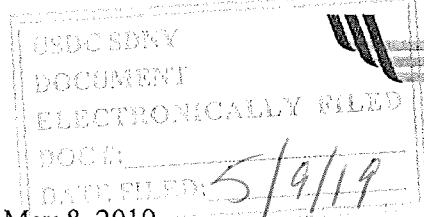


MEMO ENDORSED

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May 8, 2019

VIA ECF

Hon. Vincent L. Briccetti
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, New York 10601-1450

Re: Indig, et al v. Village of Pomona
Civil Action No: 7:18-cv-10204-

Dear Judge Briccetti:

Defendants' time to answer, move, or otherwise respond to the amended complaint extended to 5/22/2019. Discovery deadlines extended as set forth below. The Court is unlikely to grant any further discovery extensions. In light of the below discovery extensions and the parties' intention to meet-and-confer, plaintiffs' 4/12/2019 request for a pre-motion conference regarding discovery disputes is DENIED AS MOOT (Doc. #50) and defendants' 5/17/2019 letter in response to those disputes is no longer necessary. Finally, defendants' reply in support of their motion to disqualify plaintiffs' counsel remains due by 5/10/2019.

The Clerk shall terminate the letter-motion. (Doc. #50).

So ordered.

Vincent L. Briccetti, U.S.D.J., May 9, 2019

This joint letter is being submitted on behalf of the parties with regard to the enclosed proposed amended civil case discovery plan and scheduling Order.

The parties have met and conferred with regard to the outstanding discovery issues. Based on those discussions, the current state of the litigation and our recent entry into the case, the parties jointly request that the deadlines in the current civil case discovery plan and scheduling order, be extended by ninety days. Plaintiffs' counsel has consented to defendants' request that their time to respond to the Amended Complaint be extended to May 22, 2019. Further, the parties respectfully request that the Court extend the remaining deadlines in this matter, resulting in a revised schedule as set forth in the chart below:

	Original Date	New Date
Fact Discovery Completed	May 31, 2019	August 29, 2019
Non-Expert Depositions Completed	May 17, 2019	August 15, 2019
Requests to Admit Served	May 3, 2019	August 1, 2019
Expert Disclosure - Plaintiffs	June 14, 2019	September 12, 2019
Expert Disclosure - Defendants	June 28, 2019	September 26, 2019
Expert Discovery Completed	July 15, 2019	October 14, 2019
All Discovery Completed	August 1, 2019	October 30, 2019

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Further, while Plaintiffs take the position that Defendants have waived any objections to Plaintiffs' discovery demands and reserve all their rights in this regard, Defendants intend to respond to the requests and/or object where appropriate, and thus, the parties shall meet and confer on or before May 28, 2019 to discuss any issues relating to document production and/or discovery. The parties jointly request that the Court so-order the proposed amended schedule. Thank you.

Respectfully,

Wilson Elser Moskowitz Edelman & Dicker LLP

Janine M. Mastellone

Janine A. Mastellone

CC: **VIA ECF ONLY**
Bradley J. Nash, Esq.
SCHLAM STONE & DOLAN, LLP
Attorneys for Plaintiffs
26 Broadway
New York, New York 10004
(212) 344-5400

JAM:vf